

CHAITMAN LLP

465 Park Avenue
New York, New York 10022
Phone & Fax: (888) 759-1114
Helen Davis Chaitman
hchaitman@chaitmanllp.com

Attorneys for Defendant RAR Entrepreneurial Fund, Ltd.

**UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)
SIPA LIQUIDATION
(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

RAR ENTREPRENEURIAL FUND, LTD., RUSSELL
OASIS, ALAN POTAMKIN, ROBERT POTAMKIN,
and TAMIAMI TOWER CORPORATION,

Defendants.

Adv. Pro No. 10-04352 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT OF DEFENDANT'S
MOTION TO WITHDRAW THE REFERENCE**

HELEN DAVIS CHAITMAN hereby declares, under penalty of perjury pursuant to 28
U.S.C. § 1746, as follows:

1. I am a member of the bars of New York and New Jersey, and of this Court. I am a
member of Chaitman LLP, counsel for Defendant RAR Entrepreneurial Fund, Ltd., ("RAR").

2. I submit this Declaration in support of Defendant's motion to withdraw the reference pursuant to 28 U.S.C. § 157(d) and Rule 5011 of the Federal Rules of Bankruptcy Procedure.

3. Attached hereto as **Exhibit A** is a true and accurate copy of the Complaint filed by the Trustee, dated November 12, 2010.

4. Attached hereto as **Exhibit B** is a true and accurate copy of the Amended Complaint filed by the Trustee, dated December 14, 2011.

5. Attached hereto as **Exhibit C** is a true and accurate copy of RAR's Answer and Affirmative Defenses, dated September 17, 2015.

Dated: New York, New York
January 31, 2020

/s/ Helen Davis Chaitman

Helen Davis Chaitman